Department of the Interior Summit

FINAL REPORT

FOR THE:....Department of the Interior

SUBMITTED TO:....Assistant Secretary
Policy Management

PREPARED BY:.....DOI Disability Rights
Committee

August 15, 2000

Alternate formats available upon request by calling Melvin Fowler at 202-208-3455

TABL	Ε	OF	=
CONT	F	N٦	rs

I. Prologue

i.

II. Introduction

1

- Background
- Purpose of Summit
- Goals/Objectives

III. Executive Summary of Findings

2

IV. Summit

Presentation of Issues

- · Architectural Accessibility
 - 5
- · Program Accessibility
 - 11
- · Electronic & Information Technology Accessibility
- Employment

24

V. Appendices

- Agenda
 - 30
- · DOI Committee List
 - 39
- · Participants
 - 40
- References
 - 42
- · Vendor List
 - 43
- Web Sites
 - 47
- · USBR Accessibility Program Information

48

19

I. Prologue

April 14, 2000



Dear Summit Participants:

The theme of our Summit is "Beyond Awareness: Equal Opportunity for People with Disabilities in the Department of the Interior in the New Millennium." This theme epitomizes our resolve to make all facilities at the Department of the Interior accessible to people with disabilities.

We can no longer rely totally on the approaches and procedures we utilized in the past to open our programs and activities to people with disabilities. Our obligations extend to ensuring equal access to all people with disabilities. While the laws governing disability rights have not changed over the past several years, we are constantly confronted with new challenges that require innovations and options for accessibility, in both our federally assisted and federally conducted programs. We must utilize all resources available to help us achieve our accessibility goals.

Our efforts to promote compliance with the requirements of the Americans with Disabilities Act must be progressive. To this end, we will redesign our workplace and programs and activities to accommodate the needs of people with disabilities. Our goal is to strengthen and improve the quality of life and services for all of our employees and customers with disabilities.

During this conference, I challenge you to examine the effectiveness of our programs, policies and practices that we have in place to identify and eliminate unjustified barriers to full accessibility.

I am committed to making Interior an exemplary model for the benefit of more than 54 million citizens with disabilities who may in some measure participate either as customers or employees in the Department's programs, activities, or services. Individually and collectively we can address these important issues.

Sincerely,

John Berry

Assistant Secretary O
Policy, Management and Budget

I. Prologue





United States Department of the Interior

OFFICE OF THE SECRETARY Washington, D.C. 20240

MAR 3 1 2000

Dear Summit Participants:

I welcome you to the Department of the Interior's Disability Rights Summit, "Beyond Awareness: Equal Opportunity for People with Disabilities in the Department of the Interior in the New Millennium." This Summit represents our continuous efforts to make the Department a model work place for all employees. We are required to affirmatively recruit, retain and develop individuals with disabilities and to provide reasonable accommodations to the known disabilities of our employees, as well as to make our programs and facilities accessible.

The purposes of this Summit are to identify the current status of accessibility for individuals with disabilities within the Department of the Interior, determine desirable accessibility goals, and develop recommendations for how to more effectively attain those goals.

During this Summit, we will have the privilege and opportunity to consult with a number of experts regarding program accessibility, employment accessibility, electronic and information resource technology and architectural accessibility. I expect each of you to help identify barriers and challenges that inhibit the Department of the Interior's ability to provide optimum levels of access and help in the development of potential solutions to the barriers and challenges.

We are privileged to have participants from all of the bureaus and offices within the Department of the Interior along with colleagues from other Federal agencies. Thank you for joining us, and please share your experiences, insights and recommendations so that we may enrich and vastly improve accessibility and equal opportunity to all people

Sincerely,

Minnijean Brown-Trickey Deputy Assistant Secretary

for Workforce Diversity

Page iii.

I. Prologue

United States Department of the Interior



OFFICE OF THE SECRETARY

Washington, D.C. 20240

July 24, 2000

Dear Summit Participants:

The Department of the Interior Disability Rights Committee is extremely pleased and proud to be part of this important Summit Meeting entitled "Beyond Awareness: Equal Opportunity for People with Disabilities in the Department of the Interior in the New Millennium". We very much appreciate the support provided by the Assistant Secretary for Policy, Management and Budget; the Deputy Assistant Secretary for Workforce Diversity; and the Director of the Office for Equal Opportunity in planning and convening this meeting. Without their commitment and support the event would not have been possible.

We also sincerely appreciate the hard work and dedicated involvement of all of the participants representing the diverse programs of the Department. Providing equal opportunity for people with disabilities in the wide spectrum of programs, services and facilities provided by the Department of the Interior is truly a vast undertaking. It also is a responsibility shared by a wide spectrum of managers, program specialists and technical experts. The advice and technical expertise of the participants was extremely beneficial in the development of the issues and recommendations contained in this report.

The Department of the Interior established the Disability Rights Committee in 1995. The primary purpose of the committee was to pool the collective expertise in the area of disability rights within the Department, in order to assess the current status of programs and services and to advise the Secretary's Office on effective ways to improve the situation. Over the last five years, each unit of the Department has made significant progress in improving accessibility for individuals with disabilities. Yet, in spite of those efforts, the nations 54 million citizens with disabilities are still denied access to much of what we provide.

The participants of this Summit Meeting were asked to identify barriers that hindered



Page iv.

our progress, and to make recommendations that would help to overcome those barriers. We believe the recommendations in this report provide a very compreher sive analysis of the challenges we must overcome, and provide excellent recommendations for meeting those challenges. We look forward to working with the Secretary's Office in developing action plans that will more effectively address our deficiencies, and in implementing programs and services that will truly make the Department of the Interior a model for other agencies to follow.

The DOI D sability Rights Committee

IV.Introduction



Disability Rights Summit August 2000

II. Introduction

"The Summit focused on four specific issues that relate to ensuring equal opportunity for persons with disabilities. These issues were:(1) **Employment** Practices; (2) Architectural Accessibility of DOI buildings and facilities; (3) Programmatic Access to DOI programs, services and opportunities; and (4) Access to information resources such as web sites and other electronic information."

Background

The Department of the Interior's (DOI) Disability Rights Summit Meeting was held at the National Conservation Training Center in Shepherdstown, West Virginia on April 25-27, 2000. The meeting was sponsored by the Office of the Secretary, Office for Equal Opportunity, with the assistance of the Departmental Disability Rights Coordinating Committee. The purposes of this Summit were to: identify the current status of accessibility for individuals with disabilities within the Department; define accessibility goals; and develop recommendations for effectively attaining these goals. The final outcome will be the development of a Departmental Action Plan that will outline strategies to address the issues identified.

Goals and Objectives

The primary objectives of the Summit were:

- to establish the long term accessibility goals of the Department in all aspects of it's operations:
- to assess the current status of meeting those goals; and to
- develop recommendations to more effectively attain the goals.

Purpose

The Summit focused on four specific issues that relate to ensuring equal opportunity for persons with disabilities. These issues were:(1) Employment Practices; (2) Architectural Accessibility of Department of the Interior's (DOI) buildings and facilities; (3) Programmatic Access to DOI programs, services and opportunities; and (4) Access to information resources such as web sites and other electronic information. Federal laws, regulations and departmental policies mandate each of these program areas.

Format

Approximately 60 individuals representing all DOI Bureaus and the Office of the Secretary participated in the conference. The participants were from each of the Bureaus and Offices of the Department, representing the four program areas. The plenary sessions outlined the requirements in each of the program areas, current initiatives from regulatory agencies, and a review of actions currently taking place within the DOI. These sessions included technical experts from the Department of Justice, the United States Architectural and Transportation Barriers Compliance Board, the Equal Employment Opportunity Commission, the President's Committee on Employment of Persons with Disabilities, the Paralyzed Veterans of America, and the Presidential Task force on Employment of Adults with Disabilities. They also included technical experts from the DOI. Following the plenary sessions, the participants worked in small breakout groups discussing the issues, identifying the barriers that prevent DOI Bureaus from accomplishing their goals; and outlining action steps that can be taken to overcome those barriers. The Disability Rights Summit subcommittee has reviewed the reports from all four discussion groups, compiled the issues and recommendations, and developed this final report, which outlines the recommended actions.

III. Executive Summary of Findings



III. Executive Summary of Findings

Executive Summary of Findings

Many issues and recommendations relative to each of the four areas were identified and are outlined in the full report of the summit. There were, however, common issues that were consistent in all four areas, which deserve special attention and consideration. These issues are as follows:

A general lack of awareness and understanding of Departmental and Bureau responsibilities specific to persons with disabilities, and more importantly, how this responsibility can be met.

The applicable laws and regulations regarding disability rights are very broad and encompassing. In spite of the training and technical assistance provided throughout the Department, many managers and program directors are still unaware of the requirements, methods and procedures that need to be implemented to bring our programs into full compliance. The Department, through the Bureaus, must find a way to broaden continuing education and technical assistance efforts in order to reach more individuals and program areas.

An ongoing perception that accessibility is a much lower priority than other programs or concerns.

The Department is constantly faced with "high priority" or "crisis" issues. Many of these issues are due to congressional oversight or litigation. Accessibility is still viewed by many managers as "something to address after these other important issues are resolved." Consequently, in spite of the fact that disability rights mandates have been in place for over 30 years, the degree of compliance is still relatively minimal. This low level of importance is reflected in the lack of funding for accessibility programs, in the limited number of professionally trained staff to manage and implement programs, and in the lack of emphasis placed on accessibility throughout the Department. We must develop strategies to raise the "sense of urgency" regarding these programs, so more consistent actions can be taken.

Severe limitations in the amount of funding and resources designated for implementation of disability programs.

Even though accessibility and disability rights issues are mandated by Federal legislation, there has never been allocated funding to address them. Consequently, the programs are still viewed as, and frequently operated as "unfunded mandates". Many accessibility initiatives can and should be addressed as an element of other programs such as life safety, repair and rehabilitation, cyclic maintenance and new construction. However, effective implementation of a comprehensive program requires additional professionally trained staff, more in-service training opportunities, and additional fiscal resources to address some of the reconstruction necessary to bring DOI's programs into compliance. Allocation of human and fiscal resources is necessary to ensure more proactive efforts.

III. Executive Summary of Findings (Continued)

Lack of baseline information on the degree to which our existing programs and facilities are, or are not, currently accessible to and usable by individuals with disabilities.

In order for the Department and the Bureaus to make informed decisions and long term progress, DOI needs to have a better understanding of where DOI facilities and programs are in relation to full compliance with legal mandates and standards. Without this baseline information, efforts will continue to be sporadic and inconsistent. All units of the Department need to ensure that comprehensive reviews of facilities and programs are conducted in order to ensure that corrective actions are completed in conformance with accessibility standards and regulations. It is imperative that all offices of the Department develop baseline information to ensure that action plans are comprehensive, and will result in effective planning for full access. The chart on the following page summarizes the four common barriers & presents related recommendations.

3

III. Executive **Summary of Findings** (Continued)

COMMON BARRIERS/RECOMMENDATIONS IN ACCESSIBILITY PROGRAM **DEPARTMENTWIDE**

Barrier 1: LACK OF BASELINE INFORMATION ON ALL ACCESSIBILITY PROGRAM **AREAS**

GATHER BASELINE INFORMATION ON ALL ACCESSIBILITY PROGRAM **AREAS** Baseline data on the accessibility of

DOI facilities, programs, information technology and employment is not available. This lack of consistent information is a detriment to overall accomplishment for DOI's Accessibility program

Baseline evaluations of DOI facilities. programs, information technology and employment need to be completed in order to successfully plan, fund and manage the accessibility program Departmentwide

Barrier 2: **LACK OF AWARENESS & UNDERSTANDING**

Recommendation 2: CREATE AWARENESS & UNDERSTANDING

Recommendation 1:

· Lack of awareness and understanding of accessibility laws, regulations and standards governing architectural access, programmatic access. information technology access and employment is prevalent Departmentwide

Departmentwide improvement in communicating accessibility laws, requirements, regulations and standards regarding architectural access, programmatic access, information technology access and employment needs to occur

Barrier 3: **LACK OF FUNDING & PRIORITY**

Recommendation 3: ESTABLISH FUNDING & PRIORITY

· Lack of priority and funding Departmentwide is an obstacle to improving architectural access, programmatic access, information technology access and access to employment

· DOI needs to establish clear goals/priorities and funding mechanisms to assure accessibility in all programs Departmentwide



Barrier 4:	Recommendation 4:
LACK OF TRAINED & QUALIFIED	CREATE TRAINED & QUALIFIED
STAFF	STAFF
Lack of trained/qualified staff throughout DOI	Establish Departmentwide standards for training and qualifications and increase staff numbers overall

4

IV. Summit



Disability Rights Summit August 2000

IV. Summit

"Architectural
Accessibility means
the design,
construction and/or
alteration of buildings
and facilities that are
in compliance with
officially sanctioned
design standards; and
that can be entered
and used
independently by
individuals with
disabilities."

ISSUES AND RECOMMENDATIONS

ISSUE 1: ARCHITECTURAL ACCESSIBILITY IN DEPARTMENT OF THE INTERIOR BUILDINGS AND FACILITIES

Introduction

Federal legislation requires that all new buildings and facilities constructed or altered since 1968 be accessible to and usable by individuals with disabilities. Other mandates require that modifications be made to existing buildings and facilities, to the extent necessary to ensure that visitors and employees with disabilities have equal access to any program or opportunity available. Architectural Accessibility refers to the design, construction and/or alteration of buildings and facilities which are in compliance with officially sanctioned design standards and that can be entered and used independently by individuals with a disability. Over the past several years official design standards for accessibility have evolved, and this term carries a legal definition. Therefore, buildings or facilities that are not in compliance with official standards are not considered to be "accessible". To provide the level of architectural access that is required, DOI and its bureaus must (1) ensure that all new construction and alteration projects conform to the official standard; (2) ensure that modifications to improve access is incorporated into the day to day maintenance, repair and rehabilitation of our facilities; and (3) develop funding strategies to ensure adequate funding for major renovations required to bring our facilities into compliance.

Legal Authorities

The Architectural Barriers Act of 1968 (P.L. 90-480) requires all buildings and facilities built or renovated in whole or in part with Federal funds, since 1968, be accessible to and usable by physically disabled persons. Since 1968, official standards have been developed for compliance and the Architectural and Transportation Barriers Compliance Board was created to monitor and enforce compliance with the law. Designers and managers should be aware that the official design standard for providing architectural access in DOI continues to be the Uniform Federal Accessibility Standard (UFAS). A process has been initiated to replace UFAS with the more comprehensive Americans with Disabilities Act Accessibility Guidelines (ADAAG). A 1992 DOI directive instructed all Bureaus " to utilize UFAS in current construction projects," except in the few instances where ADAAG provides a higher degree of access.

Section 504 of the Rehabilitation Act of 1973 (P.L. 93-112), as amended, requires that all programs and services provided by the Department be equally accessible to individuals with disabilities. This statute does not require that every building and facility constructed prior to 1968 be modified to conform with appropriate design standards. It does require that enough of those areas be modified to ensure that employees and visitors with disabilities are not denied access to programs and opportunities because of the lack of architectural access. When modifications are made to existing buildings and facilities, they must comply with appropriate design standards. Implementing regulations for this statute are found at 43 CFR 17,

"Enforcement of Nondiscrimination on the Basis of Disability in Department of the Interior Programs". These regulations require that all departmental entities conduct a comprehensive evaluation of all programs, services, facilities and opportunities to identify the degree to which individuals with disabilities are receiving an equal opportunity; and, to develop a transition plan for how and when deficiencies or barriers will be corrected.

Implications

Many of DOI's buildings and facilities throughout the country are not as architecturally accessible as they should be under existing laws and regulations. This lack of access severely limits the ability to recruit, hire and retain individuals with disabilities into the workforce of the Department. It also prohibits the Department and it's Bureaus from ensuring that the Nation's 54 million citizens with disabilities can participate in and enjoy the wide range of services and opportunities available to the rest of our nation's citizens.

There are a number of factors that influence the degree to which DOI has or has not made progress in improving architectural access within DOI. These factors include:

- 1) Many of our buildings and facilities were designed and constructed prior to the passage of the Architectural Barriers Act and sequentially did not address the issue of accessibility. The cost of making many of buildings accessible can be substantial.
- 2) Bringing DOI facilities into compliance with accessibility requirements is perceived by many as an "unfunded mandate". We know we are required to make the modifications, but we have never had the availability of "special funds" in order to comply.
- 3)There is a general lack of understanding of what is legally required, of the importance of making buildings and facilities conform with existing standards.
- 4) Existing standards are difficult to understand and interpret. Also, standards for some of the unique facilities that we build and manage in the Department are not currently available.
- 5) Many DOI areas and facilities are located in natural or historic environments. DOI is obligated to enforce historic and natural preservation laws as well as those requiring accessibility. Finding the balance between those sometimes conflicting mandates is not always

easy.

The Department must develop a strategy to ensure that architectural barriers are identified and must then develop appropriate action plans for barrier removal. DOI must ensure that those action plans are implemented appropriately and in a timely manner. The chart on the following page summarizes the identified barriers and recommendations.

ARCHITECTURAL ACCESS (Stated recommendation does not necessarily correspond with identified barrier)

BARRIERS	RECOMMENDATIONS
Barrier 1: BASELINE INFORMATION	Recommendation 1: BASELINE INFORMATION
Limited baseline data on degree to which buildings and facilities are accessible according to current standards Magnitude of identifying deficiencies and developing action plans is overwhelming	 Establish procedures for requiring Bureaus to conduct baseline assessments of facilities to determine those with deficiencies and those that are accessible Require all Bureaus to develop action plans, defining how and when deficiencies will be corrected Establish guidelines that ensure assessments and action plans are completed in a consistent manner Departmentwide Establish a realistic time frame for completing assessments and action plans and define procedures for Bureau accountability for completion

Barrier 2: AWARENESS & UNDERSTANDING	Recommendation 2: AWARENESS & UNDERSTANDING
 Lack of awareness and understanding of laws, regulations and standards regarding architectural access Lack of understanding of the differences between new construction standards and standards for existing facilities, and the relationship to the requirements for program accessibility 	 DOI should review and update regulations regarding accessibility, and issue guidance through a Departmental manual chapter DOI should identify areas of common misunderstanding and develop special directives and information documents addressing those issues

BARRIERS (Continued)	RECOMMENDATIONS (Continued)
Barrier 2: AWARENESS & UNDERSTANDING	Recommendation 2: AWARENESS & UNDERSTANDING
 Lack of understanding interrelationships of the components of architectural access standards, resulting in "partial accessibility" by having some features, but neglecting others Lack of understanding of compliance requirements for architectural access in leased buildings and facilities Lack of understanding and consequently related lack of guidance and direction on the relationship of access and life safety issues Lack of understanding that official standards are "minimum" standards, frequently resulting in much lower level of access than could or should be provided Lack of consistency in interpretation of policies and guidelines between agencies within DOI, and outside DOI 	DOI should develop training to address the range of issues associated with the application of standards and require that all design, construction, realty, and property professionals be trained
Barrier 3:	Recommendation 3:

Barrier 3: SHORTAGE OF ACCESSIBILITY PROFESSIONALS & TRAINED STAFF

Recommendation 3: SHORTAGE OF ACCESSIBILITY PROFESSIONALS & TRAINED STAFF

- Shortage of trained and qualified staff at DOI level to provide centralized coordination, guidance and direction results in inconsistent and sometimes inappropriately designed and constructed facilities
- DOI should review current staffing assignments, and establish guidance for ensuring that adequate staff resources are made available in the area of accessibility

IV. Summit

(Continued)

BARRIERS (Continued)	RECOMMENDATIONS (Continued)
Barrier 3: (Continued) SHORTAGE OF ACCESSIBILITY PROFESSIONALS & TRAINED STAFF	Recommendation 3: (Continued) SHORTAGE OF ACCESSIBILITY PROFESSIONALS & TRAINED STAFF
Use of collateral duty personnel with limited time, limited expertise and limited training opportunities prevalent across DOI for managing accessibility program	DOI should encourage all Bureaus to ensure that appropriate staff resources are provided for the coordination and direction of access programs
Limited number of qualified staff available for completing access evaluations Departmentwide	DOI should continue to utilize the collective professional expertise throughout DOI, to assist in the development and implementation of access efforts

Barrier 4: LIMITED TRAINING OPPORTUNITIES FOR ACCESSIBILITY	Recommendation 4: LIMITED TRAINING OPPORTUNITIES FOR ACCESSIBILITY	
Availability of comprehensive training opportunities for design and construction professionals is limited Limited training opportunities for supervisory staff with program and project supervision responsibilities Limited training opportunities for managers, resulting in continual lack of support for accessibility programs Departmentwide	 Establish DOI procedures requiring implementation of Bureau awareness and technical training Consider a partnership with the National Center on Accessibility on a Departmentwide basis for maximizing training opportunities Research all available sources of accessibility training and develop a DOI catalog for Departmentwide use and include training in DOI University official courses 	

IV. Summit

(Continued)

BARRIERS (Continued)	RECOMMENDATIONS (Continued)
Barrier 5: ACCESSIBILITY IS VIEWED AS A LOW PRIORITY	Recommendation 5: ACCESSIBILITY IS VIEWED AS A LOW PRIORITY
 The current DOI priority system for repair and rehabilitation funding is a detriment to access projects, (ie, health and safety gets 10 points and code compliance which includes access gets 3 points) Lack of accountability mechanisms for full implementation of appropriate architectural access throughout the Department Serious shortage of visible, and consistent "Champions" for the issues of architectural access throughout the Department 	 DOI should consider the Bureau of Reclamations' approach to accessibility program management which established clear program goals, budget line items for funding access, and GPRA goals for accountability and progress- see appendix Elevate accessibility in the DOI priority weighting system for health and safety issues DOI should think, "Health, Safety, and Accessibility instead of just "Health & Safety" DOI should establish procedures to elevate the visibility of accessibility programs by use of special directives, announcements, articles and web site additions

Barrier 6: LACK OF FUNDING	Recommendation 6: LACK OF FUNDING
Lack of funds for existing access barrier removal	 DOI should develop a strategy for securing funds from Congress to adequately fund
Lack of funds to recruit/hire professionally trained staff needed for program coordination and implementation throughout DOI	accessibility retrofits for existing facilities. This strategy should also ensure that when "new" facilities or areas are acquired, funds are available to adequately address access.
Lack of funds to provide the full range of training opportunities	concerns
that are needed to ensure effective implementation at all levels	 Funding strategy should also include mechanisms for funding the increase of professional staff and training

"Program
Accessibility means
that the DOI not only
has to be concerned
with enabling people
with disabilities to
have architectural
access to our
programs, facilities
and services, but
must also ensure
that they can receive
as close to the same
benefits as those
received by others."

ISSUE 2: PROGRAM ACCESSIBILITY IN DEPARTMENT OF THE INTERIOR PROGRAMS AND ACTIVITIES

Introduction

Federal legislation requires that all Federal agencies ensure that individuals with disabilities are not excluded from, are not denied the benefits of, and, are not otherwise subjected to discrimination in, any program or activity provided. The Department of the Interior provides a wide range of services, programs and activities to our employees and to the public. Many of the activities involve opportunities for recreational and educational endeavors. While considerable attention has been given to modifying the built environment in order to better serve individuals with mobility limitations, much study and analysis needs to occur on meeting the programmatic needs of the broader population of individuals with disabilities.

Program Accessibility means that the DOI not only has to be concerned with enabling people with disabilities to have architectural access to our programs, facilities and services, but must also ensure that they can receive as close to the same benefits as those received by others. This means that our obligations extend to ensuring equal accessibility to individuals with visual impairments, hearing impairments, cognitive impairments, and mobility impairments.

Legal Authority

Section 504 of the Rehabilitation Act of 1973 (P.L. 93-112), as amended, is more encompassing than the Architectural Barriers Act. While the Architectural Barriers Act requires *physical* access to buildings and facilities, Section 504 requires *program* accessibility in all services provided with Federal dollars. The act itself is very brief and it states:

"No otherwise qualified individual with a disability in the United States shall, solely by reason of disability, be excluded from the participation in, denied the benefits of, or be subject to discrimination under any program or activity conducted by any Executive Agency."

Implementation regulations for this statute are found at 43 CFR 17, "Enforcement of Nondiscrimination on the Basis of Disability in Department of the Interior Programs". These regulations require that the Department ensure that employees and visitors with disabilities have the opportunity to participate in and benefit from all programs and activities in the most integrated setting possible. Additionally, we are required to provide appropriate auxiliary aids that may be necessary to enable individuals with disabilities to benefit from all programs and activities provided by the Department and it's Bureaus. Finally, the regulations require that all Departmental entities conduct a comprehensive evaluation of all programs, services, facilities and opportunities to identify the degree to which individuals with disabilities are receiving an equal opportunity; and to develop a transition plan for how and when deficiencies or barriers will be corrected.

IV. Summit

(Continued)

Implications

Program access is more encompassing and more difficult to define than architectural access. Architectural access can be evaluated with regard to a set of specific design standards, which define clearly whether a building or facility is in compliance. Most of the architectural design standards relate specifically to individuals who have mobility limitations while program access requires that the individual with a disability is not only allowed to get to a program or activity, but once there, must be able to receive the benefits of getting there. It also extends the scope of access to individuals with cognitive and sensory disabilities, in addition to those with mobility limitations. This requires that we have a broader understanding of the way in which various populations of individuals with disabilities receive and process information, and the wide range of methods and techniques needed to ensure that we are effectively communicating with them. These methods and techniques include, but are not limited to the use of sign language interpreters, captions on audio-visual programs, assistive listening devices, readers for visually impaired persons, audio and Braille versions of printed information, and other advances such as computer technology.

There are a number of factors that influence the degree to which we are making progress in improving programmatic access within DOI. These factors include:

- 1) There is a general lack of understanding about what program access is and what is legally required to be in compliance.
- 2) The diversity of the different populations of individuals with disabilities, and the diversity of needs and preferences among single disability groups, make it difficult to provide simple and consistent solutions.
- 3) Specific standards and guidelines for providing program access do not currently exist, and consequently there is a significant amount of subjectivity in determining what is required.
- 4) Bringing our programs into compliance with accessibility requirements is perceived by many as an "unfunded mandate". We know we are required to make the modifications but the Bureaus have never had the "special funds" in order to comply.

We must develop a Departmental strategy to ensure that program barriers are identified and then appropriate action plans are developed to remove those barriers. DOI must then ensure that the action plans are implemented in a timely manner. The charts on the following page summarize the identified barriers and recommendations.

PROGRAM ACCESSIBILITY (Stated recommendation does not necessarily correspond with identified barrier)

BARRIE	ERS	RECOMMENDATIONS	
Barrier BASELI	1: NE INFORMATION		mendation 1: NE INFORMATION
	Data collected during the 1988 Bureau accessibility evaluation is outdated and/or inaccurate		Require Bureaus to re- evaluate their programs and facilities
	Bureaus do not have an accurate database on accessibility deficiencies from which to plan retrofits		Develop action plans to correct deficiencies & implement the action plans

Barrier 2: AWARENESS & UNDERSTANDING	Recommendation 2: AWARENESS & UNDERSTANDING
Lack of understanding on how to meet programmatic needs for all people with disabilities Note: not all disabilities are equally addressed Emphasis on physical disabilities while sensory or hidden disabilities are often ignored Lack of understanding of what is actually required by accessibility laws and regulations Lack of understanding of the broad scope of programs Education and communication regarding accessibility issues are lacking at all levels Lack of awareness of central policy regarding accessibility at the DOI & Bureau levels	DOI should develop policy on programmatic access, providing guidance on responsibilities and legal requirements DOI should assess the range of programs DOI-wide and develop clear guidance on "what" program access is and provide direction on how to make programs accessible to all disabilities Develop training for all levels that provide guidance on our responsibilities and legal requirements specific to program access

BARRIERS (Continued)	RECOMMENDATIONS (Continued)
Barrier 3: FUNDING, PRIORITY, & ACCOUNTABILITY	Recommendation 3: FUNDING, PRIORITY, & ACCOUNTABILITY
 Funding sources for accessibility projects are often "raided" for other projects and are not protected There are not enough resources (financial, as well as human) committed to accessibility at the Bureau or DOI levels Accessibility funding for programmatic access competes with other areas and is often designated the lower priority Accessibility laws/regulations are not given equal attention as other laws and regulations concerning issues such as (1) environmental justice, (2) environmental impact, (3) notices to the public on such issues Priority on programmatic access is not equal to the priority placed on facility access "Unfunded mandates" are ignored The lack of line item funding puts accessibility projects at a serious disadvantage There is a lack of clarity, continuity, and general support for accessibility at the DOI level 	 DOI/Bureaus should establish line item funding for accessibility in annual budget Prioritize unfunded mandates in budget preparation documents Elevate the priority of all accessibility projects (facility, programmatic, and information technology) in budget process DOI/Bureaus should establish clear priorities and accountability measures, using GPRA as the method for measuring/tracking progress Obtain DOI SES/Management level support for accessibility & employment of individuals with disabilities Priority should be established equally for programmatic and facility access

Page 14

IV. Summit (Continued)

BARRIERS (Continued)

RECOMMENDATIONS (Continued)

Barrier 4: TRAINED & QUALIFIED STAFF		Barrier 4	I: D & QUALIFIED STAFF
for fi	k of frequent, in-depth training ield level employees on essibility		Develop training courses that go beyond <u>awareness</u> - get to <u>solutions</u>
supe	r participation of employees at ervisory/management level in essibility training programs	•	Develop and conduct accessibility training that addresses the needs of our internal and external customers
knov issu	oloyees have limited wledge of basic disability es and about alternative tions to program delivery		Develop and conduct required training specifically for site accessibility coordinators
requ	essibility is not included in ired training as are other nan resource issues		Develop strategies for the education of Bureaus on the issue of program accessibility: -targeted training
field not a	grams are developed at the levels, where employees are adequately versed in program ess needs and requirements	di and trainir	-by example -identify champions -best practices -integration of people with isabilities into workforce

Barrier 5: CONSUMER INVOLVEMENT	Barrier 5: CONSUMER INVOLVEMENT
People with disabilities are not fully utilized in planning and implementation of accessibility programs	 Involve people with disabilities and disability rights groups in decision making
	 Survey our customers to help determine accessibility needs
	 Involve people with disabilities in conducting evaluations and planning
	 Build relationships between program areas and accessibility professionals including interested people with disabilities and organizations representing people with disabilities

IV. Summit (Continued)

BARRIERS (Continued)	RECOMMENDATIONS (Continued)
Barrier 6: ACCOUNTABILITY/LEADERSHIP	Recommendation 6: ACCOUNTABILITY/LEADERSHIP

There is a lack of accountability and upper management commitment		The DOI and all Bureaus should develop a strategic plan on accessibility
Talk is cheap-noticeable action and implementation of Bureau transition plans are lacking	•	Establish a DOI Task Force (with all areas represented) to provide guidance on implementation of Bureau
There is a lack of consistency and direction from DOI and upper management relative to a		accessibility policies and programs
number of management issues; e.g., "What constitutes 'undue burden?" "What is 'program access' and what needs to be		Integrate program access into all Bureau management and budget plans
accessible" "What does a 'program when viewed in its entirety' mean?"		All Bureau management documents such as NEPA (Environment Impact), planning documents, general
DOI is not pro-active in anticipating potential impacts of new and existing laws, There is a knee jerk reaction to issues		management plans, etc should have a section addressing accessibility
There is inconsistent application of accessibility standards and laws across the Bureaus	•	Evidence of commitment to accessibility should start at the top; Accountability for accessibility should be reflected in management performance measures
Lack of communication from the TOP on DOWN and ACROSS Bureau lines	•	Share accessibility information across DOI/Bureaus
Development and implementation of consistent policy across Bureau lines is lacking		
"Buy-in" for accessibility program is not evident at upper levels		

IV. Summit

(Continued)

BARRIERS (Continued)	RECOMMENDATIONS (Continued)	
Barrier 6: ACCOUNTABILITY/LEADERSHIP (Continued)	Recommendation 6: ACCOUNTABILITY/LEADERSHIP (Continued)	
	Raise responsibility for accessibility compliance	

	 (include program access) to the highest level within the organization (non-political slot) Reissue DOI Public Notification Policy that was issued in September 1999 Develop clear guidance and policy on inclusion of access in all programs Develop strategies to involve upper management
Barrier 7: SHORTAGE OF ACCESSIBILITY PROFESSIONALS & TRAINED STAFF	Recommendation 7: SHORTAGE OF ACCESSIBILITY PROFESSIONALS & TRAINED STAFF

IV. Summit

(Continued)

BARRIERS (Continued)	RECOMMENDATIONS (Continued)	
Barrier 8: TECHNICAL ASSISTANCE	Recommendation 8: TECHNICAL ASSISTANCE	
DOI policy and guidance on program accessibility is lacking	DOI should work with the Bureaus to develop a published document providing	

DOI guidance on public
notification and access to
information for all forms of
public communication is lacking

- No DOI centralized source of information on contractors, vendors, consultants, etc. for program access
- guidance on program accessibility issues; ie, Open vs Closed Captioning, TTY vs Relay Services, etc
- DOI should publish guidelines and directives with accessibility examples and solutions
- DOI should issue guidance to clearly identify accessibility responsibilities
- DOI should develop guidance on program accessibility issues specific to public notification and access to information to include guidance on all forms of public communication (brochures, public meetings, videos, etc)
 - DOI should develop a reference library of contractors, vendors, and consultants with accessibilty expertise

IV. Summit (Continued)

"Section 508 of the Rehabilitation Act of 1973, as amended requires that all

ISSUE 3: ELECTRONIC AND INFORMATION TECHNOLOGY ACCESSIBILITY IN THE DEPARTMENT OF THE INTERIOR

Introduction

In a memorandum to the Heads of all Federal Agencies, in April of 1999, Attorney

Federal agencies ensure that when they develop, procure, maintain, or use electronic and information technology; that, it is accessible to employees with disabilities." General Janet Reno stated:

"We live in a world that is becoming increasingly cognizant of the needs and rights of persons with disabilities. In 1990, Congress passed the Americans with Disabilities Act, which has been described as the most sweeping civil rights legislation since the Civil Rights Act of 1964. This important law expanded upon the Rehabilitation Act of 1973, which protected persons with disabilities from discrimination in federally-assisted and federally-conducted programs."

We also live in a world that is becoming increasingly dependent upon computers and other electronic and information technologies for providing the information that we need in our daily lives. Computer technology is found in almost all workplaces and is an integral part of much of the equipment that surrounds us. Adaptive technology, such as computer screen reading software and braille display units, enable people with disabilities to use this technology. Whenever agencies buy new computer programs or electronic equipment for the workplace, there is a risk that this new equipment will not work with adaptive technology. In so doing, people with disabilities are excluded. Section 508 of the Rehabilitation Act seeks to address this potential problem."

Legal Authority

Section 508 of the Rehabilitation Act of 1973 (P.L. 93-112), as amended

requires that all Federal agencies ensure that when they develop, procure, maintain, or use electronic and information technology; that, it is accessible to employees with disabilities. It also requires equal access to all information provided by Federal agencies. Electronic and information technology is expansively defined. It includes computers (such as hardware, software, and accessible data such as web pages), facsimile machines, copiers, telephones, and other equipment used for transmitting, receiving, using, or storing information. As the initial step in the implementation process, Section 508 required Federal agencies to conduct a self-evaluation of their current electronic and information technology and to report the results to the Department of Justice by June 15, 1999. DOJ was then required to report the results of this governmentwide survey to the President by February 7, 2000.

The Architectural and Transportation Barriers Compliance Board (The Access Board), in consultation with other government agencies and private organizations, is responsible for developing standards for complying with Section 508. The Access Board is in the process of developing standards for compliance. Ultimately, these requirements will be incorporated into the Federal Acquisition Regulation within six months after implementation of final rule. All agencies, including the Department of the Interior, must then revise their procurement policies and directives to incorporate the new standards. If an agency procures

Page 19

IV. Summit (Continued)

electronic and information technology after August 7, 2000, that does not comply with the standards it is subject to administrative complaints and private lawsuits by employees and members of the public.

Implications

In addition to conducting the self-evaluation regarding the extent to which DOI

electronic technology is accessible to individuals with disabilities and submitting a report to the Department of Justice, Federal agencies are also required to take additional steps. These steps include ensuring that all current information and electronic technology is accessible to people with disabilities and developing procedures to comply with the proposed Access Board standards. Much of the hardware and software used in the Department of the Interior predates the enactment and amendments to Section 508, and until the results of the survey mandated by Section 508 are compiled, the magnitude of the Department's deficiencies will not be fully known.

There are a number of factors that influence the degree to which we have made progress in improving information and electronic technology access within DOI. These factors include:

- 1) A general lack of understanding about what electronic access is and what is legally required for compliance across DOI.
- 2) The range of disabilities, and the diversity of needs and preferences among individual disability groups makes it difficult to provide simple and consistent solutions.
- 3) Specific standards and guidelines for providing program access do not currently exist, and consequently there is a significant amount of subjectivity in determining what is required.
- 4) Bringing information and electronic technology into compliance with accessibility requirements is perceived by many as an "unfunded mandate".

We must develop a Departmental strategy to ensure that we identify where we have information and electronic technology deficiencies and then develop appropriate action plans to correct these deficiencies in a timely manner. The charts on the following pages summarize the identified barriers and recommendations.

Page

20

IV. Summit (Continued)

INFORMATION TECHNOLOGY ACCESS (Stated

recommendation does not necessarily correspond with identified barrier)

Barrier 1:	Recommendation 1:
BASELINE INFORMATION	BASELINE INFORMATION

Lack of baseline data on the accessibility of DOI electronic and information technology (IT) program	Evaluate DOI's IT to establish baseline information on DOI's overall IT program accessibility
	Disseminate results of August 99 preliminary Section 508 survey throughout DOI
	Assure that qualified/trained accessibility and IT staff are used in the next effort to evaluate DOI's IT program

Barrier 2: UNDERSTANDING & AWARENESS	Recommendation 2: UNDERSTANDING & AWARENESS	
Generally across DOI, there is limited to no understanding of the accessibility requirements of IT	Basic training on the requirements of IT needs to be developed and training offered to IT and Accessibility staff Departmentwide	
The IT community has limited to no knowledge of accessibility requirements	Cross train IT staff on accessibility requirements Departmentwide	
	 Use DOI seminars, technical training sessions and web- based information on accessible IT to provide information and train 	
	Encourage Departmentwide relationships and contacts with existing IT programs at DOD (CAP), DOA (Target), GSA (CITA)	

IV. Summit

(Continued)

BARRIERS (Continued)	RECOMMENDATIONS (Continued)
Barrier 2: UNDERSTANDING & AWARENESS (Continued)	Recommendation 2: UNDERSTANDING & AWARENESS (Continued)
	As part of a comprehensive

	effort to create greater awareness and understanding of accessibility, DOI should issue current information regarding accessibility requirements of IT
--	--

Barrier 3:	Recommendation 3:
LACK OF FUNDING	LACK OF FUNDING
Lack of funding Departmentwide is an obstack to addressing IT	Start-up funding is needed to work on technology issues Consistent with other barriers/recommendations, DOI should develop a strategy to secure funds from Congress to adequately address IT accessibility issues

Barrier 4: SHORTAGE OF TRAINED/QUALIFIED STAFF	Recommendation 4: SHORTAGE OF TRAINED/QUALIFIED STAFF
DOI overall has a shortage of staff trained/qualified in the area of IT accessibility	Establish DOI procedures/standards requiring implementation of technical training in the area of IT accessibility
	Research all available sources of training in this area and develop a DOI catalog for Departmentwide use

IV. Summit

(Continued)

BARRIERS (Continued)	RECOMMENDATIONS (Continued)
Barrier 5: LACK OF MANAGEMENT LEVEL INVOLVEMENT FOR IT	Recommendation 5: LACK OF MANAGEMENT LEVEL INVOLVEMENT FOR IT

ACCESSIBILITY	ACCESSIBILITY
Across DOI there is a lack management level involvement for IT accessibility, making it more difficult to initiate improvements	Develop an accessible IT group that includes current accessibility staff, IT staff and representatives from the DOI web master council This group would serve to educate and advocate IT accessibility
	DOI's IT groups (Web, Hardware, Lan, etc) should coordinate and develop guidelines and test procedures for DOI (with input from accessibility staff)
	Each Bureau needs to identify and appoint a Bureau Section 508 Coordinator

Barrier 6:	Recommendation 6:
LACK OF CHAMPIONS FOR IT	LACK OF CHAMPIONS FOR IT
ACCESSIBILITY	ACCESSIBILITY
Lack of champions for IT accessibility makes it more difficult to initiate improvements	Encourage the development of champions from the highest levels in DOI and the Bureaus

Barrier 7:	Recommendation 7:
LACK OF ACCOUNTABILITY	LACK OF ACCOUNTABILITY
Lack of policy, guidance and accountability across the breadth of IT accessibility	 Management at all levels must be accountable and responsibilities should be tied to performance

IV. Summit (Continued)

ISSUE 4: EMPLOYMENT OF PERSONS WITH DISABILITIES IN THE DEPARTMENT OF THE INTERIOR

"Equal opportunity in employment for all people, regardless of race, color, sex, age, religion, national origin, or disability is the common goal across the Federal government as well as the Department of the Interior."

Introduction

gislation requires that all Federal agencies ensure that individuals with disabilities are not excluded from, are not denied the benefits of, and are not otherwise subjected to discrimination in, any program or activity provided. These mandates give special emphasis to the issue of employment. Equal opportunity in employment for all people, regardless of race, color, sex, age, religion, national origin, or disability is the common goal across the Federal government as well as the Department of the Interior. The Equal Employment Opportunity Commission Management Directive 713, dated October 6, 1987, provides the primary guidance for all Federal agencies regarding this issue. This Directive states, in part:

"The objective is for the Federal Government to become a model employer of persons with disabilities. Federal agencies are to ensure that qualified individuals with disabilities and Federal employees who become disabled after appointment, have a full measure of opportunities to be hired, placed, and advanced in Federal jobs. Affirmative action is to be an integral part of ongoing agency personnel management programs, as evidenced by person with disabilities being employed in a broad range of grade levels and occupational series commensurate with their qualifications and by agency policies that do not unnecessarily exclude or limit

Legal Authority

The most significant law that requires equal employment opportunity for persons with disabilities in the federal government is **Section 501 of the Rehabilitation Act of 1973, as amended.**

Section 501 of the Rehabilitation Act of 1973 requires all federal agencies to establish an affirmative action plan to encourage the hiring, placement, and promotion of individuals with disabilities. Responsibility for assuring compliance with section 501 rests with the Equal Employment Opportunity Commission (EEOC). Directives published by EEOC direct each agency to have an annual written affirmative action plan that specifies goals for employing and advancing applicants and employees with disabilities. Agencies are also directed to make particular efforts to employ individuals with "targeted disabilities"; set goals for the overall number of workers with one or more of these targeted disabilities; ensure the elimination of architectural and program barriers that limit individuals with disabilities; establish procedures for providing reasonable accommodation for employees with disabilities; and establish complaint procedures for employees who believe that they have been discriminated against.

Page 24

IV. Summit (Continued)

Implications

The Department of the Interior has established a Diversity Action Plan that includes the goal of developing a workforce that reflects the diversity of the nation. This plan and the plans of all the Bureaus include goals and objectives for increasing the

number of individuals with disabilities as well as other minority groups. It is recognized that the current work force does not reflect appropriate numbers of individuals with disabilities; and that action needs to be taken to expand and increase our outreach to individual with disabilities. We also must improve our procedures for ensuring that individuals with disabilities are afforded equal opportunity in advancement and promotion, including the provision of reasonable accommodation and opportunities for continuing education.

There are a number of factors that influence the degree to which we have in the past, and currently are making progress in improving employment of individuals with disabilities within the Department of the Interior. These factors include:

- 1) We must establish a greater awareness of the number of qualified individuals with disabilities that are available, and we must establish procedures for eliminating the attitudinal barriers that have traditionally limited their employment. We must also establish better outreach to agencies and organizations of individuals with disabilities in order to improve our recruitment efforts.
- 2) We must continue to work to eliminate the architectural barriers that currently exist in our work environment, to ensure that individuals with disabilities can more effectively perform the essential functions of their jobs.
- 3) We must continue to educate managers and supervisors about the importance of providing "reasonable accommodation" for employees with disabilities and on effective methods and techniques for providing that accommodation. These accommodations include things such as computer technology, readers for employees with visual impairments, sign language interpreters, telecommunication devices, and other specialized equipment and considerations.
- 4) We must develop strategies to ensure that employees with disabilities can have equal opportunities for advancement and promotion, as well as access to entry-level positions.

In short, we need Departmental strategies to identify factors that discriminate against individuals with disabilities, and develop action plans for how these factors can be eliminated or corrected. The charts on the following pages summarize the identified barriers and recommendations.

Page 25

IV. Summit (Continued)

EMPLOYMENT (Stated recommendation does not necessarily correspond with identified barrier)

Barrier 1: Lack Awareness & Understanding	Recommendation 1: Lack of Awareness & Understanding		
Lack of knowledge about persons with disabilities, their capabilities, and needs	Develop education/awareness programs for managers on the capabilities of persons with disabilities		
 Fears concerning persons with disabilities and reasonable accommodation Lack of knowledge of where to find persons with disabilities for the workforce 	Develop and make available reliable resources of information regarding persons with disabilities for all Bureaus DOI should review and update		
Lack of understanding about the laws surrounding employment of persons with disabilities	regulations and policies regarding employment of individuals with disabilities and reissue clear guidance and policy on employment of people with		
 Personnel offices Departmentwide lack understanding/knowledge of basic accessibility issues including hiring authorities and reasonable accommodation measures for individuals with disabilities Managers do not understand what reasonable accommodation is or how it is to be applied 	Develop education/awareness program for human resource personnel on the basic authorities for hiring, reasonable accommodation information and other resources necessary for the hiring of Individuals with disabilities DOI should provide examples and showcase success stories in the hiring/placement of Individuals with disabilities - use People Land & Water and other mediums to		
	DOI should prepare a study to show financial benefits of employment of individuals with disabilities		

IV. Summit

(Continued)

BARRIERS (Continued)	RECOMMENDATIONS (Continued)		
Barrier 2: Architectural Access for Individuals With Disabilities	Recommendation 2: Architectural Access for Individuals With Disabilities		
Facility access for individuals with	Assure that Bureaus meet basic		

 Lack of uniformity in vacancy announcement statements Individuals with disabilities hiring, 	 Identify broad opportunities for employment of targeted individuals with disabilities 	
Barrier 3: Lack of Outreach/ Recruitment/Retention of Individuals With Disabilities (Continued)	Recommendation 3: Lack of Outreach/ Recruitment/Retention of Individuals With Disabilities (Continued)	
BARRIERS (Continued)	RECOMMENDATIONS (Continued)	
	Program for hiring entry level individuals with disabilities	
	Maximize the use of the Intern	
in hiring individuals with disabilities	plans including a toll free recruitment hotline and web site	
Lack of management participation	source accompanied with aggressive targeted recruitment	
job of marketing positions to individuals with disabilities	Develop a centralized recruitment	
DOI/Bureaus needs to do a better	disabilities	
disabilities is prevalent across DOI	opportunities for employment and advancement for individuals with	
The lack of promotional opportunities for individuals with	Provide more upper level	
individuals with disabilities	recruitment programs for individuals with disabilities	
DOI/Bureaus have a very limited outreach/recruitment program for	 DOI/Bureaus needs to review and revamp their outreach and 	
Barrier 3: Lack of Outreach/ Recruitment/Retention of Individuals With Disabilities	Recommendation 3: Lack of Outreach/ Recruitment/Retention of Individuals With Disabilities	
	 DOI should issue guidance regarding GSA's role and provide clarification of DOI versus GSA's accessibility responsibilities regarding leased space 	
	and retrofits	
of understanding of legal requirements/standards	accountability (thru GPRA) for completing required evaluations	
Lack of funding for retrofits GSA leased space and GSA's lack	DOI should require that Bureaus establish priorities, funding, and	
across DOI	of employment for accessibility and follow through with retrofits	
across DOI	OF EUDIOVIDED FOR ACCESSIONIV ADD	

IV. Summit

(Continued)

	use of authorities, etc., needs to be made a part of Human Resourcel's standard set of information	Reinstate targeted disability recruitment in Human Resources			
	standard set of information	Develop Departmentwide standard language			
		Assure that DOI/Bureau Personne offices are aware of hiring authorities			
		Utilize the DOI Affirmative Action plan for hiring individuals with disabilities			
		Enforce disability goals in the DOI Strategic Plan for Work- force Diversity			
Barrier 4: Lack of Management Support, Priority, Accountability, & Funding		Recommendation 4: Lack of Management Support, Priority, Accountability, & Funding			
	Lack of management's support and commitment for hiring individuals with disabilities	Obtain SES/Management level support for accessibility and employment of individuals with disabilities			
•	Lack of champions at the SES level for Individuals with disabilities	 Develop DOI/SES/Manageme level champions for accessibil 			
•	Lack of priority at the highest levels in DOI/Bureaus	and employment of individuals with disabilities			
	Lack of accountability at the highest levels in DOI/ Bureaus	DOI should hire a Departmentwide Accessibility Coordinator to coordinate all aspects of program			
ВА	RRIERS (Continued)	RECOMMENDATIONS (Continued)			
Bai Suj Fui	RRIERS (Continued) rrier 4: Lack of Management pport, Priority, Accountability, & nding pontinued)	RECOMMENDATIONS (Continued) Recommendation 4: Lack of Management Support, Priority, Accountability, & Funding (Continued)			

disability program funding with authorizations similar to Life Safety

and Seismic Safety programs

priorities and accountability

DOI/Bureaus should establish clear

coordinator for accessibility

Lack of incentives/awards for

disabilities

support of accessibility program, including hiring Individuals with

Page 28

(Continued)

IV. Summit

measures, using GPRA as the
method for measuring/tracking
progress

V. APPENDIX

Disability Rights Summit National Conservation Training Center

Shepherdstown, West Virginia

April 25-27, 2000

"BEYOND AWARENESS:

Equal Opportunity for People with Disabilities in the Department of the Interior in the New Millennium"

Sponsored by:

Page 30

Office for Equal Opportunity
Office of the Secretary
U. S. Department of the Interior

SUMMIT DESIGN

- I. Purpose of Summit
- To identify the current status of accessibility goals in all aspects of Interior's operations
- To determine desirable accessibility goals
- To develop recommendations as to how to effectively attain the goals

II Expected Outcome

- A Departmentwide action plan that will outline strategies to address the issues identified.
- III. Role of Participants
- To help identify barriers and challenges that inhibit the Department of the Interior's ability to provide optimum levels of access
- To help in the development of potential solutions to the barriers and challenges

Disability Rights Summit

U. S. Department of the Interior

National Conservation Training Center

Shepherdstown, West Virginia

Tuesday, April 25, 2000

Registration

2:30 P.M - 4:00 p.m. 6:30 P.M. - 7:00 p.m.

Dinner/Reception

5:30 p.m. - 6:30 p.m.

Opening Session

7:00 p.m.. - 8:30 p.m.

Master of Ceremony David Park

Chairperson Departmental

Accessibility Committee

Introduction and Welcome E. Melodee Stith

Director

Office for Equal Opportunity

Opening Remarks and Introduction Minnijean Brown-Trickey

of Speaker Deputy Assistant Secretary

for Workforce Diversity

Speaker Rebecca Ogle

Executive Director

Presidential Task Force on Employment of Adults with

Disabilities

Closing Remarks James A. Westbrooks

Special Assistant for Civil Rights Office for Equal Opportunity

Disability Rights Summit

U. S. Department of the Interior

National Conservation Training Center

Shepherdstown, West Virginia

Wednesday, April 26, 2000

MORNING Employment Accessibility Auditorium

8:00 a.m. - 9:30 a.m. PANEL

Linda Kontnier, Senior Policy Analyst Presidential Task Force on Employment of Adults with Disabilities

Phil Calkins, Director Affirmative Employment Division Office of Federal Operations U. S. Equal Employment Opportunity Commission

Paul Meyer, Deputy Director President's Committee on Employment of People with Disabilities

Samuel Bowser, Assistant Director Workforce Diversity and Evaluation Office for Equal Opportunity

Facilitator: Patty Hagan U. S. Geological Survey

Recorder: Robert Jackson Office for Equal Opportunity

Wednesday, April 26, 2000

9:30 a.m. - 9:45 a.m. Break/Refreshments

9:45 a.m. - 11:30 a.m. Small Group Workshops

White - Room IE-103 Yellow - Room IE-141 Red - Room IE-29 Green - Room IE-118

11:30 a.m. - 12:15 p.m. Summary of Group Reports

Plenary Session Auditorum

Presiding: E. Melodee Stith, Director Office for Equal Opportunity

12:15 p.m. - 1:00 p.m. LUNCH

AFTERNOON Facility Accessibility
Auditorium

1:00 p.m. - 2:30 p.m. PANEL

Larry Roffee, Executive Director U. S. Access Board

Al Bernstein, Structural Engineer Technical Services Center Bureau of Reclamation

Norman T. Suazo, Chief Division of Programs, Planning and Implementation Office of Facilities Management and Construction Bureau of Indian Affairs

Facilitator: Kay Ellis

Bureau of Land Management

Recorder: Arthur Quintana Minerals Management Service

Page 34

V. APPENDIX (Continued)

Wednesday, April 26, 2000

2:35 p.m. - 2:45 p.m. Break/Refreshments

2:45 p.m. - 4:30 p.m. Small Group Workshops

White - Room IE-103 Yellow - Room IE-141 Red - Room IE-129 Green - Room IE-118

4:30 a.m. - 5:30 p.m. Summary of Group Reports

Plenary Session Auditorium

Presiding: E. Melodee Stith, Director Office for Equal Opportunity

Close of Afternoon Session

Dinner

(Or On Your Own)

35

V. APPENDIX (Continued)

Disability Rights Summit

U. S. Department of the Interior

National Conservation Training Center

Shepherdstown, West Virginia

Thursday, April 27, 2000

MORNING Program Accessibility
Auditorium

8:00 a.m. - 9:30 a.m. PANEL

Robert E. Walter, Assistant Solicitor Personnel Litigation and Civil Rights Office of the Solicitor

Christine A. Brown, Education Specialist Division of Planning Office of Indian Education Bureau of Indian Affairs

Doug Staller, Chief Outreach and Visitor Services Division of Refuges U. S. Fish and Wildlife Service

Maureen McCloskey, National Advocacy Director

Office of Advocacy Paralyzed Veterans of America

Facilitator: David Park National Park Service

Recorder: Delores Webster

Office of Surface Mining, Reclamation and

Enforcement

Page 36

V. APPENDIX (Continued)

Thursday, April 27, 2000

9:30 a.m. - 9:45 a.m. Break/Refreshments

9:45 a.m. - 11:30 a.m. Small Group Workshops

White - Room IE-103 Yellow - Room IE-141 Red - Room IE-129 Green - Room IE-118

11:30 a.m. - 12:15 p.m. Summary of Group Reports

Plenary Session Auditorium

Presiding: E. Melodee Stith, Director Office for Equal Opportunity

12:	15	p.m	1:00	p.m.	LUNCH
-----	----	-----	------	------	-------

AFTERNOON Electronic Technology and Information Resources Auditorium

1:00 p.m. - 2:30 p.m. PANEL

Larry Roffee, Executive Director U. S. Access Board

Mary Lou Mobley, Esq.
Disability Rights Section - Civil Rights Division
U. S. Department of Justice

John R. Snyder, Chief ADP Acquisition and Technical Assistance Division Office of Information Resources Management

Facilitator: Christine Louton Bureau of Indian Affairs

Recorder: Don Thie National Park Service

Page

37

V. APPENDIX (Continued)

Thursday, April 27, 2000

2:35 p.m. - 2:45 p.m. Break/Refreshments

2:45 p.m. - 4:30 p.m. Small Group Workshops

White - Room IE-103 Yellow - Room IE-141 Red - Room IE-129 Green - Room IE-118

4:30 a.m. - 5:30 p.m. Summary of Group Reports

Plenary Session Auditorium

Presiding: E. Melodee Stith, Director Office for Equal Opportunity

38

V. APPENDIX (Continued)

Department of the Interior Disability Rights Committee

David Park, Chairperson National Park Service

Jack Andre National Park Service

Ray Bloomer National Park Service

Jeffrey Dallos U.S. Geological Survey

Kay Ellis Bureau of Land Management Melvin C. Fowler Office for Equal Opportunity

Doug Gentile

Fish and Wildlife Service

Robert Jackson

Office for Equal Opportunity

Patty Hagan

U.S. Geological Survey

Christine Louton

National Business Center

Karen Megorden Bureau of Reclamation

Robert E. Walter, Esq. Office of the Solicitor

Delores Webster

Office of Surface Mining Reclamation and Enforcement

Nancy Trent

Office of the Secretary, Information Resources

Page 39

V. APPENDIX (Continued)

Participant List

Name Agency

Amy Berger

Al Bernstein

Sam Bowser

U.S. Geological Survey

Bureau of Reclamation

Office of the Secretary,

Office of Equal Opportunity

Amy Bradley U.S. Geological Survey

Wayne Braxton National Park Service
Christine Brown
Minnijean Brown-Trickey Deputy Assistant Secretary

Patricia Callis Mineral Management Service

Joel Campbell

Kaye Cook

George Cortes

George DaBai

U.S. Geological Survey

U.S. Geological Survey

Fish and Wildlife Service

Bureau of Land Management

Caroline Dawson Fish and Wildlife Service

Liz Dawson Fish and Wildlife Service
Larry Dean Fish and Wildlife Service
Al Dobbins Office of Surface Mining
Kay Ellis Bureau of Land Management,

Jim Feagans Mineral Management Service
Steve Felch Mineral Management Service

Meh in Fourier Office of the Secretary

Melvin Fowler Office of the Secretary,

Office of Equal Opportunity

Theresa Fresquez

Doug Gentile

Dave Govoni

Bureau of Land Management
Fish and Wildlife Service
U.S. Geological Survey
Bill Green

Magaly Green

Bureau of Land Management
Fish and Wildlife Service
National Park Service

Alexandra Chavez-Hadley U.S. Geological Survey

Patty Hagan

Dave Hartman

Sheila Halley

Ellie Hasse

U.S. Geological Survey

National Park Service

Office of Human Resources

Bureau of Reclamation

Joe Helmkamp National Park Service

Howard Henderson Fish and Wildlife Service Bob Jackson Office of the Secretary,

Office of Equal Opportunity

James E. Joiner Office of Surface Mining

Curtis Kron Bureau of Reclamation
Shirley Lahr Office of Surface Mining

Patricia Lowery Office of Surface Mining

Corky Mayo National Park Service
Andrew McDermott Fish and Wildlife Service

Karen Megorden Bureau of Reclamation

Chris Nielson
Peggy Nelson
John Nicholas
Terry O'Sullivan
Dave Park
Carlita Payne
National Park Service
Fish and Wildlife Service
Bureau of Indian Affairs
Bureau of Land Management
National Park Service
Fish and Wildlife Service

Participant List (Continued)

Name Agency

Gary Peacock Office of the Secretary,

National Business Center

Joan Putnam Bureau of Land Management

Arthur Quintana Mineral Management Service Rich Ray Bureau of Land Management

Mineral Management Service Paul Rosado

National Park Service Adele Singer

Richard Sorensen Fish and Wildlife Service Doug Staller Fish and Wildlife Service

Carol Steeper Mineral Management Service Melodee Stith

Office of the Secretary,

Office of Equal Opportunity

National Park Service Don Thie

Nancy Trent Office of the Secretary,

Information Resource Management

Bureau of Land Management Jeff Walker

Bob Walters Office of the Solicitor **Delores Webster**

Office of Surface Mining U.S. Geological Survey Susan Wells James Westbrooks Office of Equal Opportunity

Tamia Williams National Park Service

Doug Wink Office of Surface Mining

U.S. DEPARTMENT OF THE INTERIOR-ACCESSIBILITY REQUIREMENTS LEGAL AND REGULATORY CITATIONS

Section 501 of the Rehabilitation Act of 1973

Public Law 93-112; 29 U.S.C. 794

Implementing Regulations: 29 CFR Part 1614

Requires that Federal agencies take affirmative action to recruit, hire and promote persons with disabilities in the Federal government. Also, contains nondiscrimination provisions for employees and applicants regarding Federal employment.

Section 504 of the Rehabilitation Act of 1973

Public Law 93-122; 29 U.S.C. 794

Implementing Regulations (for DOI): 43 CFR Part 17, Subpart E

Requires that Federal agencies provide program access to persons with disabilities. It covers persons with various types of disabilities, and requires a broad range of methods, techniques and auxiliary aids to assure the required program access.

Section 508 of the Rehabilitation Act of 1973

Public Law 99-506; Implementing regulations (enforceable by the U.S. Access Board) are still pending

Requires that Federal agencies ensure that electronic and information technology is accessible to employees with disabilities. This includes computer hardware and software, telephones, fax machines and Web pages.

Architectural Barriers Act of 1968

Public Law 90-480; 42 U.S.C. 4151 et seg

Implementing Regulations: 41 CFR Subpart 101-19.6

Requires that all new buildings and facilities constructed or altered since 1968 with Federal funds be accessible to and usable by persons with disabilities.

National Historical Preservation Act of 1966

Public Law 89-665; 16 U.S.C. 470

Empowers the Secretary of the Interior to maintain and expand a national register of historic sites. The act protects such facilities from renovations and alterations pending a review/exemption process. This process also covers the exemptions pertaining to making these properties accessible to persons with disabilities.

Americans with Disabilities Act of 1990

Public Law 101-336, [s.933]: July 26, 1990

Requires state and local government and private entities to ensure access for persons with disabilities in employment, public services, public transportation, public accommodation and telecommunications. The ADA does not apply directly to the Federal government; however, in application of design standards, the greater accessibility requirement of the ADAAG applies in situations when DOI has responsibility of a Title II entity.

V. APPENDIX

(Continued)

Disclaimer Notice:

The vendors listed on this page and the following pages participated in the April 27 & 28, 2000 Accessibility Summit and are being included in the Final Report in reference to their participation in the Summit.

The Department of the Interior does not endorse any of the services or products offered by these vendors.

DIRECTORY OF EXHIBITORS

AbleData

Contact Person: Catherine Belknap Address: 8630 Senton St., Suite 930

Silver Spring, MD 20910

Voice: (800) 227-0216 Voice: (301) 608-8998 TTY: (301) 608-8912 Fax: (301) 608-8958

Email:

lowe@macroint.com

kabelknap@aol.com

Website: www.abledata.com

ABLEDATA is a Federally funded project whose primary mission is to provide information on assistive technology and rehabilitation equipment available from domestic and international sources to consumers, organizations, professionals, and caregivers within the United States. The ABLEDATA database contains information on more than 25,000 assistive technology products (17,000 of which are currently available). ABLEDATA is sponsored by the National Institute on Disability and Rehabilitation Research (NIDRR), part of the Office of Special Education and Rehabilitative Services of the U.S. Department of Education.

ADMS (Accessibility Data Management System)

Contact Person: Karen Megorden U.S. Bureau of Reclamation

1150 N. Curtis Rd., Suite 100 Boise, ID 83706

Voice: (208) 378-5053

TTY:

Fax: (208) 378-5023

Email: kmegorden@pn.usbr.gov www.pn.usbr.gov/adms Website:

The Accessibility Data Management System, developed by the Bureau of Reclamation, is a computer system designed to facilitate the management of accessibility programs within government. ADMS is the first nationwide computer program specifically designed for this purpose.

Page 43

V. APPENDIX

Bartimaeus Group

(Continued)

Contact Person: Mary Smith or Dave Wilkinson Address: 1481 Chain Bridge Road, Suite 100

McClean, VA 22101

Voice: (703) 442-5023 Fax: (703) 734-8381

Email: <u>dave@bartsite.com</u>

Website: www.bartsite.com

Bartimaeus Group provides access solutions for people who are blind/visually impaired. We also provide on-site adaptive technology training and support along with a wide variety of products.

Computer Prompting and Captioning Co. - CPC

Contact Person: Sidney Hoffman

Address: 1010 Rockville Pike, Suite 306

Rockville, MD 20852

Voice: (800) 977-6678 or (301) 738-8487

TTY: (301) 738-8489 Fax: (301) 738-8488

Email:

info@cpcweb.com

Website: <u>www.cpcweb.com</u>

CPC develops and sells closed captioning systems and operates a closed captioning service. Closed captioning systems and services are on the GSA Schedule. Users can caption videos themselves with CPC's captioning systems or CPC's service can caption videos for them.

Federal Relay Service

Contact Person: Angie Officer

Address: 13221 Woodland Park Drive

Herndon, VA 20171

Voice: (703) 904-2510 TTY: (800) 597-9009 Fax: (703) 904-2069

Email:

angela.officer@mail.sprint.com

Federal Relay Service will have brochures, magnets, and a videotape presentation that will provide information about its work. Representatives will be there to answer questions.

NISH (National Institute for the Severely Disabled

Contact Person: Laurisa Timmerberg

Address: 2235 Cedar Lane

Vienna, VA 22182

Voice: (703) 641-2720

TTY:

Fax: (703) 849-8916

Email: <u>Itimmerberg@nish.org</u>

Website: http://www.nish.org

NISH was established in 1974 and currently provides information and services to more than 1,800 CRPs nationwide who are Associated with NISH; nearly 600 of which are presently providing services or producing products under the JWOD Program. NISH's role also includes working with Procurement Agencies which are the federal entities that purchase the products and services provided by the CRPs employing individuals with disabilities.

Our Mission: NISH creates employment and training opportunities for people with severe disabilities through participation in the Javits-Wagner-O-Day Program by providing professional and technical assistance to not-for-profit Community Rehabilitation Programs and our federal partners.

President's Committee on Employment of People with Disabilities (PCEPD)

Contact Person: Jackie Creek

Address: 1331 F Street, NW, Suite 300

Washington, DC 20004

Voice: (202) 376-6200 x54

TTY: (202) 376-6205 Fax: (202) 376-6859

Email:

creek-jacqueline@pcepd.gov

The President's Committee on Employment of People with Disabilities is a small Federal agency based in Washington, DC. The Committee's mission is to communicate, coordinate, and promote public and private efforts to enhance the employment of people with disabilities.

Speech Solutions, Inc.

Contact Person: Barbara C. Mann Address: 8716 Falkstone Lane Alexandria, VA 22309

Voice: (703) 360-3800 Fax: (703) 360-0310

Speech Solutions, Inc. specializes in providing solutions for voice recognition products to enable hands free access to computers. It features the award-winning Dragon Naturally Speaking Voice Recognition System.

Page 45

V. APPENDIX (Continued)

US Department of Agriculture TARGET Center

Contact Person: Ophelia Falls

Address: 1400 Independence Avenue, SW, Rm, S-1006

Washington, DC 20250

Voice and TTY: (202) 720-2600 Fax: (202) 720-2681

Email: ophelia.falls@usda.gov

Website:

http://www.usda.gov/00/target.htm

The TARGET Center's mission is to support the Department's work force diversity and the Federal work force 2000 policies. The Center provides information resources and technology demonstrations to assist USDA employees in locating and selecting equipment adapted to the needs of disabled employees. These services assure equal access to electronic technology and automated systems essential to today's jobs.

46

V. APPENDIX (Continued)

Need Answers? Check these Websites

Reference Sites for Section 508 (Information Technology)

http:www.nsbc.org/GSA/index.htm

http://www.itpolicy.gsa.gov/coca/index.html

http:www.access_board.gov

http:www.w3.org.WAI

http://www.microsoft.com/enable/-3.1bm.com/able/guidelines.htm

http:www.diversityinc.con/body_news_div.htm

http:www.usdoj.gov

http://www.itpolicy.gsa.gov/cita/

http://www.ed.gov/offices/OSERS/NIDRR/

http://www.abledata.com/

Reference Sites for Section 501 (Employment)

http://www.usajobs.opm.gov/b1h.htm

http:www.pcepd.gov

http://www.jan.wvu.edu/english/homeus.htm

http://www.eeoc.gov

General Reference (Program Accessibility)

http://www.usdoj.gov/

http://www.access-board.gov/

http://www.doi.gov/diversity/8able.htm

Page 47

V. APPENDIX (Continued)

Reference to the Bureau of Reclamation's Accessibility Program

The Bureau of Reclamation has established a comprehensive accessibility program that addresses the range of accessibility issues defined by the DOI Summit. Following is a description of Reclamation's program specific to it's reference in the Summit Report.

The Bureau of Reclamation Strategic Plan for Accessibility Program Management

Goal:

Establish a successful Accessibility program which assures compliance and full access to the facilities and programs Reclamation provides nationwide. Achieve full accessibility through a coordinated and planned process utilizing proactive management, technical assistance, guidance and accountability.

Objectives:

- Reaffirm Reclamation's policy and strategy for achieving complete accessibility compliance in all areas.
- Il Complete the reevaluations of all Reclamation programs, services and facilities utilizing the Accessibility Data Management System (ADMS).
- III Continue encouraging the use of the ADMS system as an accessibility program management and tracking tool.
- IV Continue efforts to develop and maintain awareness of the legal rights of disabled individuals.
- V Continue the process of assuring that accessibility studies, projects and other initiatives are appropriately funded and prioritized.
- VI Continue cooperative partnerships with grass roots organizations for the purpose of providing ongoing program support, technical assistance, and guidance in obtaining program accomplishment.

Management Priorities:

Short Term:

- Reissue Reclamation policy and strategy for achieving disability rights compliance.
- Establish a baseline of the Reclamation facilities, programs and services to develop a foundation for long term planning for accessibility retrofits and related costs.

Page 48

V. Appendix (Continued)

Management Priorities: (Continued)

- Provide ongoing awareness and other technical training on disability related issues to Reclamation staff.
- Institute annual disability meetings for the purpose of furthering Reclamation's program and maintaining a high level of knowledge of disability standards and guidelines.
- Establish Government Performance Results Act goals to assure progress and accountability for accessibility within Reclamation
- Establish a quarterly progress report to quantify progress in all program areas including accomplishment, budget, and outreach initiatives.
- Establish accessibility as a line item in Reclamation's annual budget

process. Continue to work with Reclamation Regions to confirm annual accessibility budgets for modifications and assure that Reclamation's program is adequately funded.

 Maintain existing partnerships with outreach organizations and encourage all regions to actively participate.

Management Priorities Long Term:

- Work with the DOI Accessibility Committee to further disability rights initiatives including shared training, resources, and services.
- Continue to develop the capabilities of the ADMS for providing program management and tracking capability, and technical assistance.

Management Actions:

- Reissued Reclamation wide policy on Accessibility.
- Determined the status of evaluation completion in Reclamation using the ADMS.
- Developed a ten-year (10) plan for completion of evaluations, action plans and retrofits.
- Established GPRA goals tied to the ten-year (10) plan to assure agency commitment, accomplishment, accountability, and priority.
- Developed awareness and technical training programs for all levels of program management (approximately 200 Reclamation employees have been trained to date).

Page 49

V. Appendix (Continued)

Management Actions: (Continued)

- Established Universal Accessibility as a line item in Reclamation's annual budget and beginning in FY 2002, Reclamation will budget resources to begin retrofits.
- Established a partnership with C.A.S.T. for Kids National Foundation to foster outreach and support of accessibility initiatives in line with Reclamation's Water Management Mission. Reclamationwide sponsor 15 C.A.S.T. for Kids events annually.
- Established a partnership with Reclamation's Technical Service Center to provide accessibility evaluations and action planning services. Twenty Architects, Engineers and Engineering Technicians have been trained and are providing evaluation assistance to Reclamation, BLM, OSM, and USGS.